

Before the
Federal Communications Commission
Washington, DC

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of) MM Docket No. 93-270
)
Amendment of Section 202(b),)
Table of Allotments,) RM-8323
FM Broadcast Stations) RM-8339
(Cordele, Dawson, Leary, Nashville,)
Hawkinsville, Cusseta, Cuthbert &)
Montezuma, Georgia))

To: Chief, Allocations Branch

**FURTHER REPLY COMMENTS OF TRI-COUNTY BROADCASTING, INC.
and MONTEZUMA BROADCASTING**

Tri-Country Broadcasting, Inc. ("Tri-County"), licensee of Station WQSY, and Montezuma Broadcasting ("MB"), by their attorney, hereby submit their comments with respect to the Comments, Reply Comments, and Counterproposals filed in this proceeding. With respect thereto, the following is stated:

1. Tri-County/MB proposed that the FM Table of Allotments be amended as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Montezuma, GA	236A	280C3
Hawkinsville, GA	280C3	236C2
Cusseta, GA	279A	264A
Cuthbert, GA	264A	--

This would allow the Commission to approve the upgrade of two allotments, which would improve the ability for service to be provided to those communities and their surrounding areas. These objectives can be accomplished by allowing Montezuma

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and Hawkinsville to engage in a mutual swap of channels of allotment, namely deleting Channel 236A at Montezuma and instead allotting Channel 236C2 to Hawkinsville, and deleting Channel 280C3 at Hawkinsville and instead allotting Channel 280C3 to Montezuma. These channel swaps in turn can be accomplished by changing the allotment currently assigned to Cusseta from Channel 279A to Channel 264A, and deleting the vacant and unapplied-for Channel 264A allotment at Cuthbert. This proposal is mutually-exclusive with the proposals RCI and DBC initially proposed in this proceeding, insofar as their proposals to substitute Channel 236A for Channel 252A are short-spaced with the Hawkinsville C2 upgrade proposed by Tri-County. Dawson Broadcasting Company has proposed (as its "Option II") the allotment of Channel 251C3 at Leary in lieu of Channel 251C3 at Dawson. Tri-County/MB has supported this proposal, insofar as it will provide local service to a community without its own broadcast outlet, and the proposal does not conflict with the Tri-County/MB proposals. Radio Cordele, Inc. ("RCI") initially proposed the substitution of Channel 236A for Channel 252A at Cordele, Georgia, and the substitution of Channel 290A for Channel 236A at Montezuma, Georgia. Tri-County/MB has opposed this proposal insofar as it will result in no discernible gain of service to the public, and is an veiled attempt to subvert the Commission's upgrade rules through fabricating a need to change channels by claiming imaginary, not-cognizable "interference," and requesting movement only to channels at which it will be able to later obtain a protected one-step upgrade -- a procedure to which it is not entitled on its current frequency of operation. Finally, Tifton Broadcasting Corp.

("Tifton"), licensee of Station WJYF(FM), proposes to allot upgrade Channel 237C2 in lieu its present Channel 237C3 at Nashville, Georgia. This proposal is mutually exclusive with the proposals submitted by Tri-County and MB, and should be denied insofar as grant of Tri-County/MB's proposals (combined with the grant of DBC's "Option II") will result in a net gain of service to 276,625 persons, improved service to two communities, and new local service to one community; while the grant of Tifton's proposal (combined with the grant of DBC's "Option II") will result in a new gain of only 183,201 persons, with improved service to only one community (together with the new local service to the same new community). For this reason, grant of the Tri-County/MB proposals clearly would be in the greater public interest.

2. The only arguments that Tifton raises concerning why its proposal should be favored over that of Tri-County/MB is that (1) the grant of Tri-County's proposal would "likely open Channel 236C2 to competing applications" (Reply Comments at 5); and (2) that upgrade of Tifton's station to Class C2 would permit 60 dBu service to "204,370 persons" together with service from DBC's stations to 140,050 persons, as compared to Tri-County's service to "only 197,730 persons" and MB's service to "only 87,975 persons" (Reply Comments at 5) -- thus, Tifton believes that since grant of its proposal will provide more overall service, the public interest would be best served by adoption of its proposal. There are at least three flaws in Tifton's reasoning.

3. First, it states no reason why Channel 236C2 would be "opened to competing applications." As Tri-County already has shown, Tri-County's (and

MB's) proposals constitute "incompatible channel swaps" under the Commission's upgrade policies, and thus are protected from competing applications.¹

4. Second, Tifton's analysis of gain areas fails to take into account that that operation of Station WAZE as a Class C3 station (at Leary) also could be accomplished through grant of the Tri-County/MB proposals. Thus, while grant of Tifton's proposal (along with DBC "Option II") would allow "overall" service (using its numbers) to "344,420 persons," grant of Tri-County/MB's proposals (along with DBC "Option II") will provide overall service to a superior 425,755 persons. Thus, even under Tifton's simplistic analysis, Tri-County/MB proposals are superior.

5. Thirdly and most importantly, the nature and scope of Tifton's population analysis is inaccurate. The Commission does not examine "overall" population service when examining and comparing upgrade proposals, but rather, examines the number of persons within gain areas. Greenup, KY and Athens, OH, 68 R.R.2d 1437, 1441 ¶ 12 (1991). As established previously, using this proper methodology, it has been established that grant of Tri-County's proposal will allow WQSY to provide service to an increased area encompassing 3764.1 sq. km. and 126,441 persons, and for MB to provide service to Montezuma to an increased area that

¹ Amendment of the Commission's Rules Regarding Modification of FM Broadcast Licenses to Higher Class Co-channel or Adjacent Channels, 60 R.R.2d 114, 120 ¶ 24 (1986). See, e.g., Pikeville, KY, Clinchco, VA and Matewan, WV, 6 FCC Rcd 3732 (Chief, Allocations Branch 1991); Angola, Berne, Decatur, Lagrange, and Roanoke, IN; Brooklyn and Hudson, MI, 6 FCC Rcd 1230 (Acting Chief, Allocations Branch 1991); Beverly Hills, Chiefland, Holiday, Micanopy and Saratoga, FL, 8 FCC Rcd 2197 (Chief, Allocations Branch 1993). See also, Cordova, Holly Pond, and Warrior, AL, 5 FCC Rcd 6301 (Deputy Chief, Policy and Rules Div. 1990).

encompasses 4768.1 sq. km., and which will allow service to 56,760 more persons that currently would be served from the community's current allotment. In all, Tri-County's and MB's proposals will provide expanded service (Allotment Priority 4) to areas with populations of 183,201 persons. In contrast, Tifton's proposal, standing alone, proposes new improved service to only 79,565 persons. Tri-County Reply, Engineering Statement at ¶ 9. Thus, since Tri-County/MB will service a greater number of persons within its gain areas (183,201) than would Tifton (79,201), and since this difference of 104,000 persons represents 130.25% more persons², "[c]onsidered on this basis alone, [Tri-County/MB's] proposals would best serve the public interest." Greenup, KY and Athens, OH, 68 R.R.2d at 1441 ¶ 12.

6. This superiority has been confirmed through completion of a "Greenup Study" in Attachment 1, hereto. An analysis of the quality of the gain areas that would be newly served by Tifton's proposal and those that would be newly served by Tri-County's and MB's proposals has been examined by examining the number of services already being provided within each portion of the gain areas, and discounting those gain areas accordingly. This is the procedure advocated by the Commission in the Greenup case. See Greenup, KY and Athens, OH, 69 R.R.2d at 1441-44 ¶¶ 13-14 and Appendices A & B. Using that analysis, it is seen that Tri-County's and MB's proposals have an overall "Population/Service Index" of 12,433, while Tifton's proposal has an overall "Population/Service Index" of only 5100. This represents a

² Since both proposals contemplate the simultaneous adoption of DBC "Option II," the further gains that would be realized by grant of that proposal are cross-cancelling, and are not included in this analysis or that which follows.

difference of 7,333, which illustrates that under this analysis, Tri-County/MB's service gain is 143% greater than Tifton, which even more fully justifies grant of their proposals.

7. Based upon all the forgoing, the proposals of Tri-County Broadcasting, Inc. and Montezuma Broadcasting should be preferred over that of Tifton Broadcasting Corp.

8. Radio Cordele, Inc. and Dawson Broadcasting Company argue that the Tri-County/MB Counterproposal should not be accepted, claiming that it was short-spaced to a granted but-not-yet-constructed construction permit for WCHZ, and arguing that Channel 264A at Cuthbert should not be deleted since it has not been subject to an "application window." Similarly, Walter McCrary, Jr. has expressed an interest in applying for Cuthbert, Georgia in the event a channel becomes available. These arguments are incorrect or irrelevant. First, with respect to Station WCHZ, in cases where a rulemaking proposal is short-spaced to a existing station which has been ordered to a new channel, and the permit has been granted but has not yet been constructed, it is Commission policy to grant such a proposal, and to condition commencement of operations on the upgraded channel on the construction of the other facility. See, e.g., Canton and Louisiana, MO, 8 FCC Rcd 340 (Chief, Allocations Branch 1993); Taylorville, MS, 2 FCC Rcd 4330 (Chief, Allocations Branch 1987). In this respect, it is noted that by Report and Order, DA 93-319, issued on April 13, 1993, Station WCHZ already was ordered to move to Channel 236C3 (with a site restriction that prevents continued use of its current site as a fully

spaced site). Second, with respect to the deletion of Cuthbert, Georgia, RCI's and DBC's claims that an application window was never opened at Cuthbert is incorrect. Channel 264A at Cuthbert was allotted in MM Docket No. 80-90, following which the allotment was applied for by and granted to one "Daniel Roy Limitone" (File No. BPH-890720MC), but the proposed station was never constructed. This permit subsequently was cancelled and deleted. Report No. 15288 (June 18, 1992). Nevertheless, in light of the expression of interest that has been received, the availability of alternative channels for Cuthbert has been studied, and it has been determined that an alternative channel can be allotted for Cuthbert, namely Channel 286A, can be allotted by imposing a slight restriction on the allotment of Channel 287C3 in the event that proposal even is adopted. Thus, potential service to Cuthbert can be maintained.

9. In short, there exists no impediment to the grant of Tri-County's and Montezuma Broadcasting's proposals. They will provide superior benefits to the public, and are in full accord with the Commission's Rules and policies.

WHEREFORE, it is respectfully requested that the proposal of Tri-County Broadcasting, Inc. and Montezuma Broadcasting be adopted, that the Commission allow Montezuma and Hawkinsville to engage in a mutual swap of channels of allotments, namely deleting Channel 236A at Montezuma and instead allotting Channel 236C2 to Hawkinsville, and deleting Channel 280C3 at Hawkinsville and instead allotting Channel 280C3 to Montezuma; that the Commission further change the allotment currently assigned to Cusseta from Channel

279A to Channel 264A, and to delete the vacant and unapplied-for Channel 264A allotment at Cuthbert or else allot Channel 286A at Cuthbert. Further, it is proposed the in the event it is determined that WAZE can change its city of license in accordance with the Commission's policies concerning changes in cities of license, that the Commission also delete Channel 251A at Dawson, assign Channel 251C3 at Leary, and to modify the license of Station WAZE accordingly.

Respectfully submitted,

TRI-COUNTY BROADCASTING
COMPANY
&
MONTEZUMA BROADCASTING

By: 

Dan J. Alpert

Their Attorney

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February 14, 1994

REPLY COMMENTS TO DOC 93-270
FILED BY TRI-COUNTY BCSTG CO. AND
MONTEZUMA BROADCASTING
February 1994

These reply comments to Docket 93-270 are filed jointly on behalf of Tri-County Broadcasting Co. ("Tri-County") and Montezuma Broadcasting ("Montezuma"). Dawson Broadcasting Company ("DBC") requests in Docket 93-270 to upgrade the presently allotted Channel 251A at Dawson to 251C3 allotted to either Dawson or Leary (both Georgia). DBC has three different upgrade plans (Options I, II, and III). Radio Cordele, Inc. ("RCI") has requested, in the same docket, to be moved laterally from Channel 252A to Channel 236A. Additionally, Tifton Broadcasting Corporation, ("TBC") has requested the upgrade of the presently allotted 237C3 to 237C2 at Nashville, Georgia.

Tri-County and Montezuma have previously commented indicating mutual exclusivity between many of the upgrade options listed above. Tri-County and Montezuma now intend to illustrate the best upgrade plan to not only serve more persons, but the plan to provide larger upgrade areas with the most underserved persons. This plan is a combination of the Tri-County/Montezuma proposals to upgrade Hawkinsville, Georgia from 288C3 to 236C2, upgrade the vacant allotment at Montezuma, Georgia from 238A to 288C3 and the endorsing of the DBC Option II which provides 251C3 service at Leary, Georgia. There is no need to further change the Table Of Allotments by substituting channels at Cordele, Georgia;

therefore they may remain undisturbed on Channel 252A and be adequately spaced to all elements to the Tri-County, Montezuma and DBC Option II proposals.

SPACING TO HARLEM, GEORGIA

Tri-County did not address the temporary shortage to the hypothetical Class C3 reference site at Harlem, Georgia. WCHZ, Harlem only received it's C3 construction permit on December 7, 1993. Tri-County is willing to have it's Channel 236C2 Construction Permit predicated on the eventual construction and filing of FCC Form 302 by WCHZ, Harlem. This approach is consistent with Commission practices and is not procedurally incorrect.

CUTHBERT, GEORGIA ALLOCATION

Tri-County and Montezuma has proposed to delete Channel 264A at Cuthbert, Georgia. Mr. Walter McCrary, Jr. has expressed an interest in applying for an allotment for Cuthbert. As seen in Exhibits 1A and 1B, Channel 286A can be allotted in lieu of Channel 264A. This can be accomplished by establishing a site restriction of 9.5 miles (15.3 kilometer) south for Channel 287C3 at Headland, Alabama. The current Headland site restriction is 6.1 miles (9.8 kilometers) southeast. Exhibit #2A indicates the new Headland reference site and its continued ability to provide 3.18 mV/m service to Headland, Alabama. Exhibit #2B is the allocation study assuming Channel 286A is allotted at Cuthbert, Georgia as proposed herein. The new Headland reference is approximately one kilometer from the existing site of WOOF-AM which has a

327 foot (100 meter) AGL tower. Because of close proximity to the existing tower, Federal Aviation Administration approval is thought to be readily available.

GAIN AREAS

An extensive study of the gain areas for Hawkinsville/Montezuma and Nashville was made. The comparison criteria and procedures are taken from Memorandum Opinion and Order, MM Docket 86-29, Greenup, Kentucky and Athens, Ohio ("Greenup"). Class C3, C2 and C1 stations were considered at maximum facilities. Class A stations were considered at 3 KW from 100 meters height above average terrain (HAAT) unless the authorized facility was greater. Class C and educational stations were considered as authorized. The night signal of AM full-time stations was also considered.

The extent which expanded contours penetrate a county into areas not served by current authorizations was made. That gain (expressed as a percentage of the county's total land area) was then applied to the total county population to determine how many persons would theoretically receive the expanded service. Towns and cities outside of the gain area or entirely inside the current authorized area were removed from the total county population since they could potentially skew the results if included. A uniform distribution of persons was assumed.

A county by county examination of the the proposed gain area of Tri-County, Montezuma and TBC was made. Where the

1.0 mV/m contour of FM stations and the night contour of full-time AM stations cross a county, population pockets are formed.

The population pocket was assigned a percentage of the total gain for the county (total gain for each county must total 100%) The total gain population of the county is then multiplied by the percentage of gain for that individual pocket to determine the population of the individual pocket. The number of full-time aural services was determined for each population pocket. Then the individual pocket population was divided by the number of services to obtain a population service index. All population service indexes are added to form the county population service index. Subsequently, the county indexes are added to form the total population service index for an upgrade proposal.

Appendix A, B, and C of these Reply Comments is the summary of this Greenup evaluation of expanded service. For convenience, the population service index is summarized below:

Iri-County Class C2 Population Service Index

<u>County</u>	<u>Index</u>
Dodge	1725
Telfair	87
Wilcox	100
Ben Hill	141
Turner	44
Laurens	922
Bleckley	278
Wilkinson	50
Twiggs	510
Houston	2184
Peach	1326

Macon 51

Total Tri-County Population Service
Index 7418

Montezuma Class C3 Population Service Index

Sumter	1617
Schely	464
Taylor	348
Houston	1156
Peach	625
Dooly	425
Crisp	260
Crawford	<u>120</u>

Total Montezuma Population Service
Index 5015

TBC Class C2 Population Service Index

Lanier	51
Clinch	96
Atkinson	425
Coffee	880
Irwin	754
Turner	58
Ben Hill	511
Tift	557
Worth	235
Colquitt	611
Brooks	94
Lowndes	822
Echols	<u>8</u>

Total TBC Population Service Index 5100

The Tri-County and Montezuma proposals are mutually dependent due to their proposed channel swap; therefore adding their individual population service indexes the sum is 12,433. Tri-County/Montezuma population service index more than doubles the TBC index of 5,100.

The largest single-county population gain index of the entire study is the Houston County index in the Tri-County gain area. This single county has a index of 2,184. To better explain the methodology, a portion of the Houston County population service index will be recalculated.

The present Tri-County C3 authorization covers 60% of Houston County while the C2 proposed herein will cover 100% of Houston County. Therefore there is an area gain of 40%. Houston County had a 1990 population of 89,208 persons. Because the City of Perry is not in the gain area but already served by the authorized C3 service, the Perry population of 9,448 is subtracted from the total population to make a revised county population of 79,760 persons. This is multiplied by 40% (because the area of gain was previously calculated to be 40%) yielding a county population gain of 31,904. When the gain area is examined for the number of full-time aural services received, we find 10 pockets (areas) of varying numbers of service.

Houston County Pocket #1 is 7% of the gain area. 7% of the 31,904 persons in the gain area is 2,233 persons in pocket #1. 15 full-time aural services were counted in Pocket #1; therefore the pocket population of 2,233 is divided by 15 to arrive at the population service index of 2184. The following is a tabulation of the remaining population pockets for Houston County:

Pocket	%	Population	Services	Index
1	7	2233	15	149
2	2	638	16	40
3	22	7018	15	468

4	7	2233	14	160
5	7	2233	13	172
6	5	1195	13	114
7	20	6380	14	456
8	10	3190	15	213
9	10	3190	16	199
10	<u>10</u>	3190	15	213
	100%			

Total County Index 2184

Only the Tri-County/Montezuma proposals and the TBC proposal were examined for gain areas and their service value indexes. Tri-County/Montezuma supports the DBC Option II and can coexist with that upgrade option. Similarly, TBC can also coexist with the DBC Option II. Because TBC and Tri-County/Montezuma can each coexist with the DBC Option II, it was unnecessary to calculate gain areas and the service value index for DBC. It is only necessary to decide which station receives the C2 upgrade, Tri-County or TBC. Because RCI has only proposed a lateral exchange of one class A channel for another, there is no gain to be examined.

CONCLUSION

Awarding the Class C2 upgrade to Tri-County and the Class C3 upgrade to Montezuma in conjunction with DBC Option II will allow:

1. First service licensed to Leary, Georgia.
2. A raw population gain of 276,625 persons will receive service from Tri-County/Montezuma. The TBC population gain does not approach this number.
3. The service value index for Tri-County/Montezuma overshadows the index for TBC by more than double. The

combined Tri-County/Montezuma index is 12,433 and the TBC index is 5,100. This index (as outlined in Greenup) evaluates the quality of the gain area by discounting gain by the number of full-time aural services received. The outstanding Tri-County/Montezuma service value index indicates a better quality gain area.

4. A continued allocation at Cuthbert, Georgia.

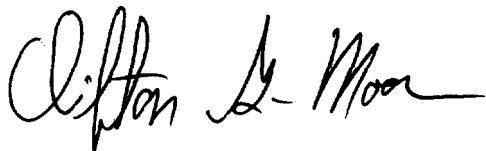
Because the Tri-County/Montezuma joint proposal is superior to the TBC proposal on every level of evaluation, and because Tri-County/Montezuma can coexist with Option II proposed by DBC, the public would be better served by approving the Tri-County/Montezuma proposals in concert with the DBC Option II.

STATEMENT OF CONSULTANT

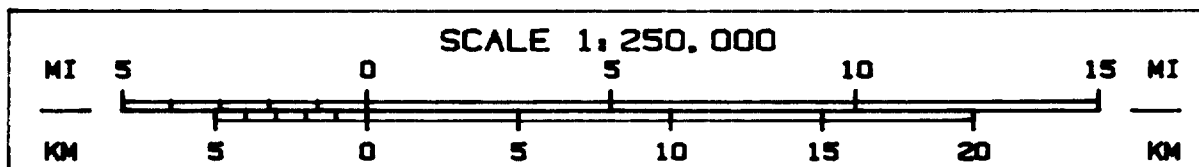
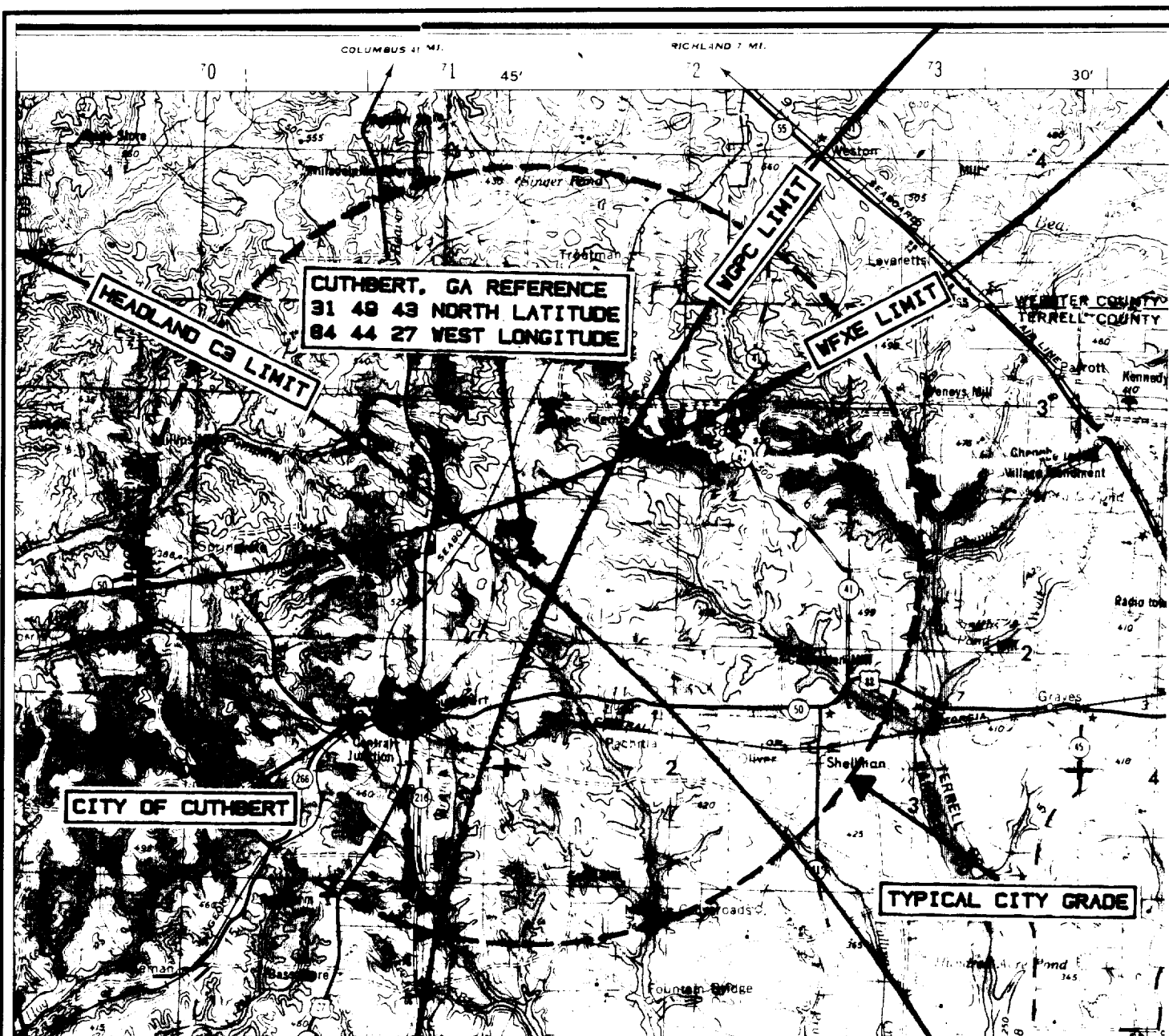
These Reply Comments were compiled on behalf of Tri-County Broadcasting Company and Montezuma Broadcasting by their consultant, Clifton G. Moor, Partner, Bromo Communications.

My qualifications are a matter of record with the Federal Communications Commission. I have been active in broadcasting since 1965.

To my knowledge, these comments are true and correct.

A handwritten signature in cursive script that reads "Clifton G. Moor". The signature is written in dark ink and is positioned above the typed name and company information.

Clifton G. Moor Dated February 13, 1994
Bromo Communications, Inc



CUTHBERT ALTERNATE CHANNEL

THE HYPOTHETICAL REFERENCE OF THE POTENTIAL NEW 287C3 AT HEADLAND, AL MUST BE CHANGED TO:
 31 12 27 NORTH LATITUDE
 85 20 46 WEST LONGITUDE

EXHIBIT #1A
 REPLY COMMENTS TO
 DOCKET 93-270 FILED BY
 TRI-COUNTY BCSTG CO AND
 MONTEZUMA BCSTG

FEBRUARY 1984

BROMO
 COMMUNICATIONS
 BROADCAST
 TECHNICAL CONSULTANTS
 St Simons Island, Georgia
 Washington, D.C.

BROMO COMMUNICATIONS INC
P.O. Box M - ST SIMONS ISLAND GA 31522

Cuthbert, Georgia
Headland at New Reference

REFERENCE

31 49 43 N

84 44 27 W

CLASS A

Current rules spacings

CHANNEL 286 -105.1 MHz

DISPLAY DATES

DATA 10-28-93

SEARCH 02-06-19

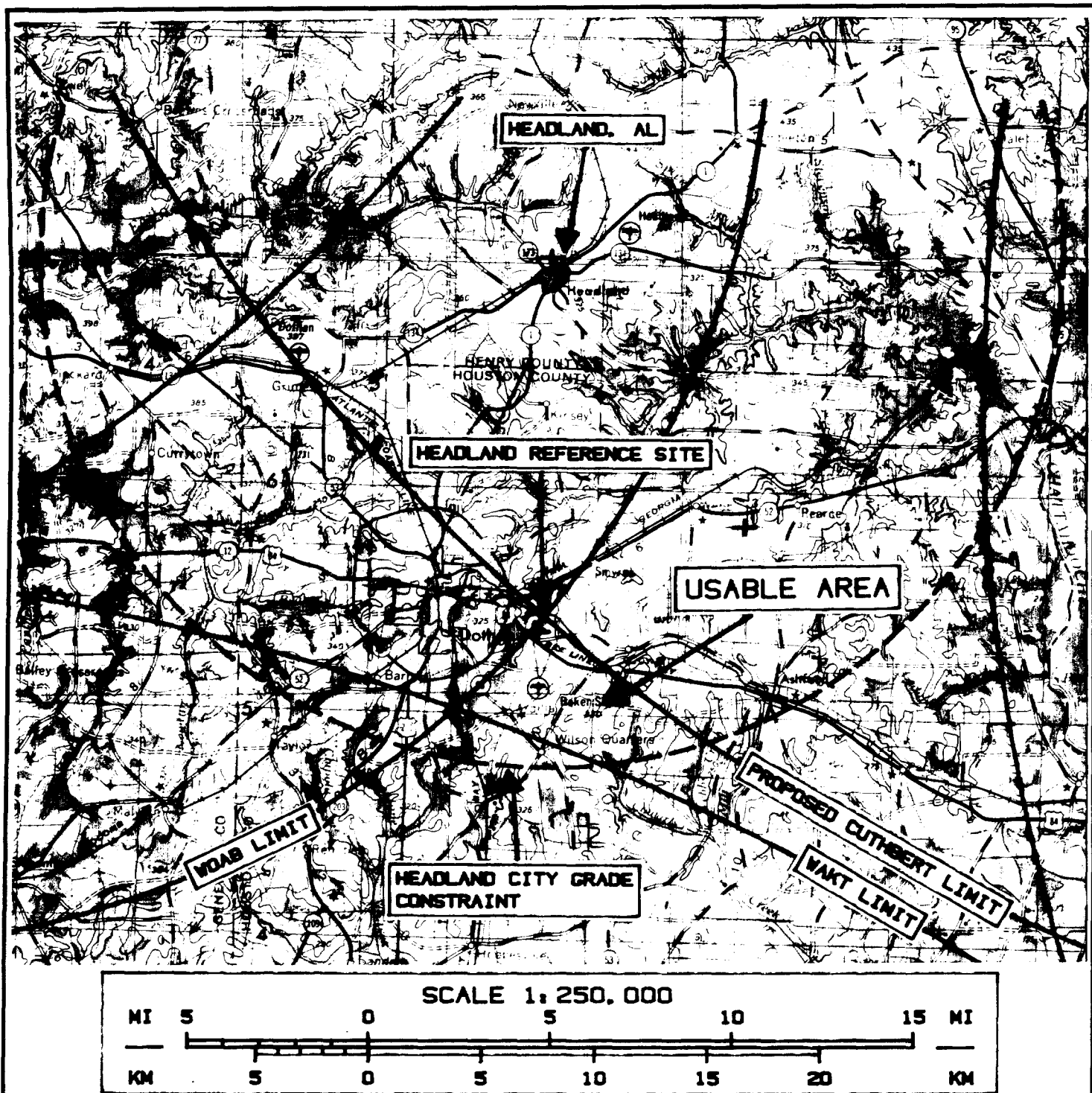
CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AD287	287C3	Headland	AL	219.9	89.71	89.0	0.71 <
WGPCFM	283C1	Albany	GA	114.0	76.31	75.0	1.31 <
WFXE	285A	Columbus	GA	340.2	74.45	72.0	2.45 <
WCAB	285A	Ozark	AL	245.1	98.48	72.0	26.48

CUTHBERT ALLOCATION STUDY

EXHIBIT #1B
REPLY COMMENTS TO
DOCKET 93-270 FILED BY
TRI-COUNTY BCSTG CO AND
MONTEZUMA BCSTG

FEBRUARY 1994

BROMO
COMMUNICATIONS
BROADCAST
TECHNICAL CONSULTANTS
St Simons Island, Georgia
Washington, D.C.



HEADLAND, AL USABLE AREA

PROPOSED REFERENCE SITE:
31 12 27 NORTH LATITUDE
85 20 46 WEST LONGITUDE

MAP IS USGS 1:250,000 SCALE DOTHAN, AL

EXHIBIT #2A

REPLY COMMENTS TO
DOCKET 93-270 FILED BY
TRI-COUNTY BCSTG CO AND
MONTEZUMA BCSTG

FEBRUARY 1994

BROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
TECHNICAL CONSULTANTS

Washington, D C

BROMO COMMUNICATIONS INC
P.O. Box M - ST SIMONS ISLAND GA 31522

Headland, Alabama
Searching at Proposed Reference

REFERENCE		DISPLAY DATES
31 12 27 N	CLASS C3	DATA 10-28-93
85 20 46 W	Current rules spacings	SEARCH 02-07-19
----- CHANNEL 287 -105.3 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AD287	287C3	Headland	AL	33.7	8.59	153.0	-144.41 *
WUMG	287A	Chattahoochee	FL	129.9	66.21	142.0	-75.79 *
DE287	287A	Chattahoochee	FL	134.0	72.91	142.0	-69.09 *
WOAB	285A	Ozark	AL	310.6	42.21	42.0	0.21 <
ALLOO	286A	Cuthbert	GA	39.9	89.71	89.0	0.71 <
WAKT	286C2	Panama City Beach	FL	200.1	121.44	117.0	4.44
WZHT	289C	Troy	AL	317.7	115.15	96.0	19.15
WQVE	288A	Camilla	GA	83.8	109.33	89.0	20.33

HEADLAND ALLOCATION STUDY

EXHIBIT #2B
REPLY COMMENTS TO
DOCKET 93-270 FILED BY
TRI-COUNTY BCSTG CO AND
MONTEZUMA BCSTG

FEBRUARY 1994

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.

APPENDIX A
TRI-COUNTY POPULATION SERVICE INDEX
COUNTY TOTALS

Dodge	1725
Telfair	87
Wilcox	100
Ben Hill	141
Turner	44
Laurens	922
Bleckley	278
Wilkinson	50
Twiggs	510
Houston	2184
Peach	1328
Macon	<u>51</u>
TOTAL	7418

APPENDIX A
TRI-COUNTY POPULATION SERVICE INDEX
STATION REFERENCE

A	WDCO
B	WPWB
C	WJTG
D	WVOH
E	WMKS
F	WKKZ
G	WVFJ
H	WGPH
I	WMGB
J	WBYZ
K	WQZY
L	WJIZ
M	WVMG
N	WRDO
O	WUFE
P	WVYV
Q	WKKN
R	WISK
S	WAYS
T	WDMG
U	Unadilla, GA CP
V	WSGY
W	WPGA
X	WQIL
Y	WRCC
Z	WYIQ
AA	McRae, GA Allocation
BB	WVRK
CC	WEGC
DD	WGPC
EE	WMCQ
FF	WDEN
GG	WFFM
HH	WQBZ
II	WOKA
JJ	WZIQ
KK	WNEX
LL	WDBN
MM	WPEZ
PP	WRCC-AM
QQ	WCOP-AM
RR	WLML C3 (Proposed)
*	Tri-County C2 (Proposed)

APPENDIX A
TRI-COUNTY POPULATION SERVICE INDEX
DODGE COUNTY

Pocket #										%	POP	SVCS	INDEX
1	A	EE		II	T	N	X	*		3	433	7	62
2	A	EE		II	T	N	X	*		2.5	361	7	52
3	A	EE	O	II	T	N	X	*		3	433	8	54
4	A	EE	O	II	T	N	X	*		2	289	8	36
5	A	EE	O	II	T	AA	J	N	X	2	289	10	29
6	A	EE	O	II	T	X	*			2.5	361	7	52
7	A	EE	O	II	T	AA	X	*		2	289	8	36
8	A	EE	O	II	T	AA	J	X	*	5	722	9	80
9	A	EE	O	II	T	AA	J	D	X	3.5	505	10	51
10	A	EE	O	II	X	*				3.5	505	6	84
11	A	EE	O	II	X	AA	*			1	144	7	21
12	A	EE	O	II	T	AA	F	J	D	4	578	11	53
13	A	EE	O	II	T	AA	F	J	X	4.5	650	10	65
14	A	EE	O	X	*					1	144	5	29
15	A	EE	O	F	*					4	578	8	98
16	A	EE	O	F	X	AA	*			5.5	794	7	113
17	A	EE	O	II	AA	J	D	X	*	4	578	9	64
18	A	EE	O	II	AA	J	X	*		1.5	217	8	27
19	A	EE	O	AA	F	J	X	*		2	289	8	36
20	A	EE	O	F	AA	J	K	X	*	2	289	9	32
21	A	EE	O	F	S	MM	X	*		5.5	794	8	99
22	A	EE	O	AA	F	K	X	*		5	722	8	90
23	A	EE	O	AA	F	K	S	MM	X	1.5	217	10	21
24	A	EE	O	F	S	MM	M	X	*	3.5	505	9	56
25	A	EE	O	F	K	S	MM	X	*	5.5	794	9	88
26	A	EE	O	F	S	MM	M	FF	X	2.5	361	10	36
27	A	EE	O	F	K	S	MM	M	X	1.5	217	10	22
28	A	EE	O	F	K	S	MM	M	FF	4.5	650	11	59
29	A	EE	O	F	S	MM	M	FF	B	2	289	11	26
30	A	EE	O	F	K	S	MM	M	FF	5.5	794	12	66
	*									1	144	8	18
31	A	EE	T	AA	J	N	X	*		3.5	505	7	72
32	A	EE	O	AA	F	X	*						
										100	1725		

C3 svc = 19% C2 svc = 100% 82% increase

17,607 X 82% = 14,438

APPENDIX A
TRI-COUNTY POPULATION SERVICE INDEX
TELFAIR COUNTY

Pocket #										%	POP	SVCS	INDEX	
1	II	T	EE	A	J	N	*			3	24	7	3	
2	II	T	EE	X	A	J	N	*		18	144	8	18	
3	II	T	EE	X	A	J	D	N	*	15	120	9	13	
4	II	T	EE	AA	X	A	J	D	N	*	15	120	10	12
5	II	T	EE	AA	X	A	J	N	*	8	48	9	5	
6	II	T	EE	AA	X	A	J	D	*	25	201	9	22	
7	II	T	EE	AA	X	A	J	D	O	*	5	40	10	4
8	II	T	EE	AA	X	A	J	D	O	*	4	32	10	3
9	II	T	EE	AA	X	A	J	D	F	*	5	40	10	4
10	II	T	EE	AA	X	A	J	D	H	*	<u>4</u>	32	10	<u>3</u>
										100				87

C3 Svc = 0 C2 Svc = 18% 18% Increase

11,000 - exclusions = 4456

4456 X 18% = 502